UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS CORPUS CHRISTI DIVISION

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§	Civil Action No. 2:14-CV-1
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DECLARATION OF ENRIQUE SANCHEZ

- 1. My name is Enrique Sanchez. I am over twenty-one (21) years of age, and am fully competent to make this declaration. I have personal knowledge of the facts stated herein, and I affirm that they are all true and correct.
- 2. I am currently a Vice President of Business Management with responsibility for Pioneer Coiled Tubing Services, LLC ("PCTS"). In my position, I have first-hand knowledge regarding the job duties of PCTS Service Technicians, including Plaintiffs Robert Villafuerte, Jose Martinez, and Rene Gonzalez.
- 3. Plaintiffs Robert Villafuerte, Jose Martinez, and Rene Gonzalez are current and former employees of PCTS who worked as Service Technicians transporting coiled tubing equipment to oil and gas exploration and production companies and who are also responsible for

the servicing and safety of the coiled tubing units. The Service Technician jobs require interstate travel and are directly related to the safety of commercial motor vehicles.

4. I declare under penalty of perjury that the foregoing is true and correct.

Executed on FEBRUARY 3,2014